



U.S. ARMY LEGAL SERVICES AGENCY ENVIRONMENTAL LAW DIVISION



First Responders: The Short Suspense Deadlines for Reporting Enforcement Actions

*by CPT Yosefi Seltzer
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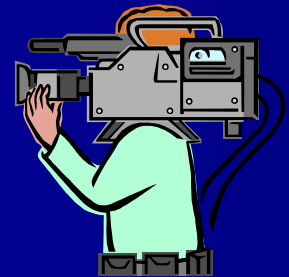
New ENFs: Fine vs. No Fine



- New ENFs that include the possibility of a fine or penalty are to be reported to Regional IMA ELS (MACOM atty) and ELD **within 24 hours** via electronic mail using ZeroNOV form

- If the ENF will draw media attention or impact the surrounding community, immediately report it to Regional IMA ELS and to ELD

An ENF in which a fine, penalty, fee or tax has not been proposed and is not likely to be proposed will be reported to the Regional IMA ELS **within 48 hours**





Regional IMA ELSes



Northeast: MAJ Bobrick

Southeast: LTC Smisek

**Northwest: Rick Murphy, Stan Citron,
John German**

**Southwest: Fort Sam Houston (Rod
Hudson, Kent Grubb)**

Pacific: Mike Kelly, Ms. Peach



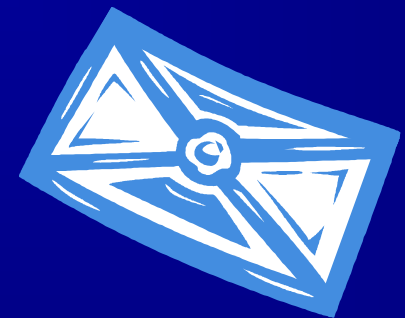
Progress Report for “Significant Activity”

**Notify ELD and Regional IMA ELS of
“meaningful progression” of
“negotiations or contested
proceedings” at all stages until final
resolution**



**Quarterly report to ELD through
Regional IMA ELSes 15 days before
close of quarter if fine assessed**

**Confirm closure with regulator,
notify Regional IMA ELS and ELD**





Questions